

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

DWIGHT GEORGE SULC,

DEBTOR.

**Case No.: BK-18-12957-JDL
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTOR

Comes now the secured creditor, MTGLQ Investors, L.P., (“Creditor”) by its attorneys, Baer & Timberlake, P.C., and hereby objects to the Chapter 13 Plan of Debtor. In support of this Objection, Creditor would show the Court as follows:

1. Creditor is the holder of a purchase money note and mortgage on the residence at 512 Cedar, Yukon, OK ("mortgaged property") of Debtor. Said note and mortgage has an estimated outstanding balance of \$57,585.44 plus accruing interest along with reasonable attorney fees and for all costs of the action.
2. The filings of Debtor fail to mention any debt to Creditor.
3. The proposed Chapter 13 Plan fails to provide for any type of treatment for the debt to Creditor, including but not limited to ongoing mortgage payments or any type of adequate protection payment to Creditor.

WHEREFORE, PREMISES CONSIDERED, Creditor moves the Court to reject the proposed Chapter 13 Plan of Debtor and/or to grant adequate protection or such other and further relief to which Creditor may be entitled.

MTGLQ INVESTORS, L.P.,

By: s/ Matthew J. Hudspeth
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CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on August 23, 2018.

Dwight George Sulc
3321 N. Virginia Ave
Oklahoma City, OK 73118

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

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